

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

EPA Region 5 Records Ctr.



374494

**DATE:** November 22, 2002

**SUBJECT:** Comments on RI/FS Work Plan for Chemical  
Recovery, Elyria, Lorain County, Ohio, Cerclis No.  
OHD057001810, dated August 2002

**FROM:** Andrew Podowski, Toxicologist  
Remedial Response Section #5

**TO:** Gwendolyn Massenburg, RPM

Section 4.2.4 Data Assessment

We generally recommend the use of Region 9 screening levels because they're the most effective in screening for COCs. The use of Region 3 or 6 screens should be used only if Region 9 screens are missing toxicity information that the other screens have.

The sentence: If concentrations of chemicals of concern do not exceed these levels, no risk assessment will be completed, should be changed to: If concentrations of chemicals do not exceed these levels, no risk assessment will be performed for these chemicals. This is so because 'chemicals of concern' by definition are already chemicals that have exceeded the screen levels.

4.3.1.1 Data Evaluation

What criteria will be used to judge whether background concentrations have been exceeded for inorganics?

I recommend the use of the regional memo: U.S. Environmental Protection Agency (EPA), 1993, **Identification of Chemicals of Concern (COCs) at Superfund Sites for the Baseline Risk Assessment**, Memorandum from Andrew Podowski, EPA Region 5 Toxicologist, to Contractors, dated November 2. This is recommended for purposes of identifying and selecting COCs.

For background values, it is recommended to use reasonable site-related background (=best) or regional background values, rather than values from guidance documents, which sometimes contain national ranges that may have little or no relevance to a specific site.

For groundwater, or any other media, ARARs e.g., MCLs are insufficient for selecting COCs and, therefore, should not be used. Rather risk-based screening values, such as Region 9 should be used. However, if ARARs are exceeded for any chemical this should be mentioned.

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